

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

APPLICATION AND AFFIDAVIT OF THE)	
UNITED STATES OF AMERICA FOR A)	
SEARCH WARRANT AUTHORIZING THE)	
OPENING OF UNITED STATES PRIORITY)	Magistrate No. 21-197
MAIL EXPRESS PARCEL EJ 615 591 858 US)	[UNDER SEAL]

**AFFIDAVIT IN SUPPORT OF AN APPLICATION
UNDER RULE 41 FOR A WARRANT TO SEARCH AND SEIZE**

I, Steven J. Celletti, being duly sworn, do hereby state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Postal Inspector with the United States Postal Inspection Service (“USPIS”) and have been so employed since April 2004. I am currently assigned to the Narcotics and Money Laundering Team at the USPIS’s Pittsburgh, Pennsylvania field office. In this capacity, I am responsible for investigating the use of the United States Mails for the purpose of transporting controlled substances such as methamphetamine, heroin, fentanyl, fentanyl-related analogs, cocaine, and other controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy). In addition, I am responsible for investigating possible violation of 18 U.S.C. §§ 1956 and 1957 (money laundering).

2. I have been involved in the investigation and discovery of drug contraband and drug proceeds on multiple occasions. I have personally been the affiant for search warrants which have resulted in the discovery of controlled substances and drug proceeds. My current

assignment involves investigating the use of the U.S. Mails by drug traffickers, in which established drug package profiles, surveillance, and drug detection dogs, among other investigative tools, are utilized.

3. Experience and drug trafficking intelligence have demonstrated that U.S. Mail is commonly used to transport drugs and drug proceeds because of its reliability and the time pressures it places on law enforcement agents to execute a successful controlled delivery.

4. This affidavit is made in support of an application under Rule 41 of the Federal Rules of Criminal Procedure, for a warrant to search for and seize evidence, instrumentalities, contraband, and fruits of violations of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy) and of Title 18, United States Code, Section 1716 (mailing injurious material) from the United States Priority Mail Express parcel bearing United States Postal Service (“USPS”) tracking number EJ 615 591 858 US (hereinafter “Subject Parcel”).

5. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, this affidavit does not set forth each and every fact learned by me during the course of this investigation.

SUBJECT PARCEL

6. On January 28, 2021, Postal Inspection Service interdiction personnel in Pittsburgh, PA interdicted the Priority Mail Express parcel bearing USPS tracking number EJ 615 591 858 US (“Subject Parcel”), addressed to “James Whiteside, 4603 Monongahela St., Pittsburgh, Pa. 15207”, with a return address of “Carol Tucker, 8113 Homestead Rd., Houston, Tx 77028”. Due to the parcel matching certain characteristics of the established drug profile, as discussed below, the parcel was pulled from the mail stream for further investigation. The Subject Parcel is a USPS Priority Mail cardboard box measuring 12” x 12” x 5 1/2” weighing approximately 3 pounds 14.3 ounces and bearing \$62.25 in U.S. Postage. (A photo of the Priority Mail Express parcel bearing USPS tracking number EJ 615 591 858 US is attached as Exhibit 1.)

7. Through experience gained in drug investigations by Postal Inspectors and other law enforcement agents, and through information provided by individuals who have been involved in buying, selling, and shipping drugs by US Mail, the Postal Inspection Service has established a drug profile consisting of characteristics frequently shared by packages containing controlled substances mailed through the United States Postal Service. The Pittsburgh office of the Postal Inspection Service utilizes this profile to screen U.S. First Class Mail, Priority Mail and Priority Mail Express packages received at the P & DC, and to review Priority Mail Express labels retained by the USPS.

8. Among the characteristics of the drug profile possessed by the package that is the subject of this search warrant affidavit is the “source state” origination of the package. Postal Inspectors, special agents of the Drug Enforcement Administration (DEA), and other intelligence sources have identified Texas as a source state for illegal drugs flowing into Pennsylvania.

9. On January 28, 2021, electronic inquiries of the CLEAR database were made for the purpose of confirming the validity of the return name and address contained on the Subject Parcel. The CLEAR inquiry confirmed that 8113 Homestead Road, Houston, TX 77028 is a valid address in Houston, Texas but there is no Carol Tucker or any individual with the last name of Tucker associated with the address.

10. On January 28, 2021, electronic inquiries of the CLEAR database were made for the purpose of confirming the validity of the recipient's name and address contained on Subject Parcel. The CLEAR inquiry confirmed 4603 Monongahela Street, Pittsburgh, PA is a valid address in the 15207 zip code, but there is no James Whiteside or any individual with the last name of Whiteside associated with the address. CLEAR has proven to be reliable in previous investigations in determining the validity of names and addresses.

11. Through my experience, I know that drug shippers will often list a false or non-existent return address, or use a valid return address with a false sender's name or no name, to reduce the possibility of apprehension by law enforcement. Although a valid recipient's address is necessary to permit the delivery of such packages, a false recipient's name is often used, for the same reason. Also, it is not uncommon for shippers to transpose numbers in the recipient's address.

EXAMINATION BY DRUG CANINE

12. Because the Subject Parcel was found to possess some of the characteristics of the drug profile, the Subject Parcel was subjected to examination by drug canine "Larry".

13. Larry, a dog trained to detect controlled substances, along with his handler Ohio Township Police Officer E. Wallace, was requested to conduct the narcotics search. Larry is certified as a drug detection dog for marijuana, cocaine, heroin, and methamphetamine. Officer

Wallace informed me Larry has been used in numerous police searches and in training exercises, and has shown a high proficiency in locating hidden drugs. (Officer Wallace's and Larry's qualifications are attached hereto as Exhibit 2.)

14. On January 28, 2021, Larry examined the Subject Parcel. According to Officer Wallace, Larry did positively alert to the parcel indicating the odor of narcotics.

15. Later today, the search warrant which is being requested herein will be executed on the Subject Parcel.

16. Based upon my training, experience, and expertise as a Postal Inspector, I submit there is probable cause to search the Subject Parcel for controlled substances and other evidence of violations of Title 21, United States Code, Sections 841(a) (1), 843(b), and 846, and Title 18, United States Code, Section 1716.

ANTICIPATORY ORDER

17. This application is an anticipatory request. If controlled substances are found inside the parcel, the controlled substances will then be seized. If controlled substance are not found inside the parcel, then the contents will be repackaged and placed back in the mail stream.

18. The above information is true and correct to the best of my knowledge, information and belief.

/s/ Steven J. Celletti

STEVEN J. CELLETTI

U.S. Postal Inspector

U.S. Postal Inspection Service

Sworn and subscribed to me, by telephone
pursuant to Fed. R. Crim. P. 4.1(b)(2)(A),
this 2nd day February, 2021.

The Honorable Patricia L. Dodge
United States Magistrate Judge